

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

SEALED INDICTMENT

-v.-

14 Cr. ____

JOHN WILLIAMS,

a/k/a "JJ,"

a/k/a "Jay,"

a/k/a "J Balla,"

a/k/a "Johnny,"

KAREEM CARTER,

a/k/a "Cee,"

a/k/a "C,"

a/k/a "Dot,"

KEITH BUIE,

a/k/a "Strong,"

TREVALE McCALL,

a/k/a "T-Mack,"

a/k/a "Bigga Velle,"

a/k/a "Bigga,"

a/k/a "Velle,"

RASHEEM RILEY,

a/k/a "Dee,"

LAFONE ELEY,

a/k/a "Lefone Eley,"

a/k/a "Fon Fon,"

a/k/a "Fon,"

BRANDON BELL,

a/k/a "White Boy,"

GENITO VALLE,

a/k/a "Pito," and

JULISSA GUARDADO,

a/k/a "Julie,"

Defendants.

- - - - - X

14 CRIM 498

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: JUL 28 2014

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2013, up to at least July 2014, in the Southern District of New York and elsewhere,

Judge Pauley

JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," KEITH BUIE, a/k/a "Strong," TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," RASHEEM RILEY, a/k/a "Dee," LAFONE ELEY, a/k/a "Lefone Eley," a/k/a "Fon Fon," a/k/a "Fon," BRANDON BELL, a/k/a "White Boy," GENITO VALLE, a/k/a "Pito," and JULISSA GUARDADO, a/k/a "Julie," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," KEITH BUIE, a/k/a "Strong," TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," RASHEEM RILEY, a/k/a "Dee," LAFONE ELEY, a/k/a "Lefone Eley," a/k/a "Fon Fon," a/k/a "Fon," BRANDON BELL, a/k/a "White Boy," GENITO VALLE, a/k/a "Pito," and JULISSA GUARDADO, a/k/a "Julie," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," KEITH BUIE, a/k/a

"Strong," TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," RASHEEM RILEY, a/k/a "Dee," LAFONE ELEY, a/k/a "Lefone Eley," a/k/a "Fon Fon," a/k/a "Fon," BRANDON BELL, a/k/a "White Boy," GENITO VALLE, a/k/a "Pito," and JULISSA GUARDADO, a/k/a "Julie," the defendants, conspired to distribute and possess with the intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 27, 2013 TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," the defendant, facilitated a narcotics transaction between KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," the defendant and a New York City Police Department ("NYPD") confidential source in the Bronx, New York.

b. On or about January 6, 2014 JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," and CARTER, the defendant, sold a quantity of crack cocaine to an NYPD confidential source in the Bronx, New York.

c. On or about May 27, 2014, WILLIAMS and GENITO VALLE, a/k/a "Pito," the defendant, spoke on the telephone to facilitate a narcotics transaction in the Bronx, New York.

d. On or about May 31, 2014, WILLIAMS took a taxi to pick-up narcotics from KEITH BUIE, the defendant, in the Bronx, New York, which narcotics WILLIAMS then packaged for sale.

e. On or about June 2, 2014, WILLIAMS and BRANDON BELL, a/k/a "White Boy," the defendant, spoke on the telephone to facilitate a narcotics transaction in the Bronx, New York.

f. On or about July 3, 2014, WILLIAMS spoke with BUIE about the packaging and sale of narcotics BUIE was supplying to WILLIAMS.

g. On or about July 4, 2014, WILLIAMS directed RASHEEM RILEY, a/k/a "Dee," the defendant, to engage in a narcotics transaction.

h. On or about July 6, 2014, WILLIAMS and JULISSA GUARDADO, a/k/a "Julie," the defendant, spoke on the telephone to discuss narcotics prices.

i. On or about July 8, 2014, WILLIAMS participated in a telephone call during which he discussed obtaining a firearm for McCALL and McCALL delivering narcotics for WILLIAMS.

j. On July 8, 2014, WILLIAMS spoke with LAFONE ELEY, a/k/a "Lefone Eley," a/k/a "Fon Fon," a/k/a "Fon," the defendant, about narcotics prices.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2013, up through and including the date of this Indictment, in the Southern District of New York and elsewhere, JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," and TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code,
Sections 924(c)(1)(A)(i), 924(c)(1)(C)(i), and 2.)

COUNT THREE

The Grand Jury further charges:

6. From at least in or about 2013, up through and including the date of this Indictment, in the Southern District of New York and elsewhere, JOHN WILLIAMS, a/k/a "JJ," a/k/a

"Jay," a/k/a "J Balla," a/k/a "Johnny," the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS and others committed armed robberies of establishments and individuals who sold goods and services that had been manufactured and shipped in interstate commerce, or otherwise affected interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT FOUR

The Grand Jury further charges:

7. From at least in or about 2013, up through and including the date of this Indictment, in the Southern District of New York and elsewhere, JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count Three of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession

of firearms, at least one of which was brandished during the robberies.

(Title 18, United States Code,
Sections 924(c)(1)(A)(ii) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

8. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," KAREEM CARTER, a/k/a "Cee," a/k/a "C," a/k/a "Dot," KEITH BUIE, a/k/a "Strong," TREVALE McCALL, a/k/a "T-Mack," a/k/a "Bigga Velle," a/k/a "Bigga," a/k/a "Velle," RASHEEM RILEY, a/k/a "Dee," LAFONE ELEY, a/k/a "Lefone Eley," a/k/a "Fon Fon," a/k/a "Fon," BRANDON BELL, a/k/a "White Boy," GENITO VALLE, a/k/a "Pito," and JULISSA GUARDADO, a/k/a "Julie," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly and indirectly as a result of the offense and any and all property used and intended to be used in any manner and part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT THREE

9. As the result of committing the robbery offense alleged in Count Three of this Indictment, JOHN WILLIAMS, a/k/a "JJ," a/k/a "Jay," a/k/a "J Balla," a/k/a "Johnny," the

defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

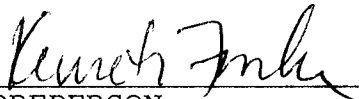
Substitute Assets Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of the said defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


PREET BHARARA *RK*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

JOHN WILLIAMS et al.,

Defendants.

SEALED INDICTMENT

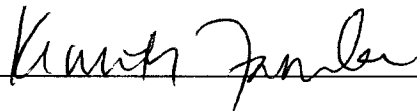
14 Cr. ____

(Title 21, United States Code,
Sections 846, 853; Title 18, United
States Code, Sections 1951, 924(c) and
2.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

July 28, 2014

Filed Sealed Indictment
U.S.M.S. Debra Freeman